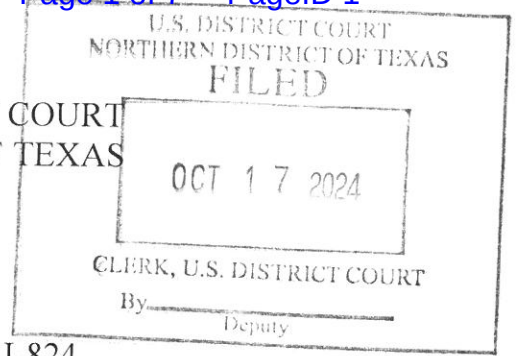


IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

No. 4:24-MJ-824

JAMIE HACKNEY (01)

**CRIMINAL COMPLAINT**

I, Christoffer Beckrich, with the Federal Bureau of Investigation, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

On or about May 27, 2024, in the Fort Worth Division of the Northern District of Texas, **Jamie Hackney**, the defendant, did use and attempt to use a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and such visual depiction was actually transported or transmitted using any means or facility of interstate or foreign commerce. Specifically, **Hackney** used Minor Victim One to create the visual depiction described below and such visual depiction was transported and transmitted via the Internet.

IMG_6513.JPG	<i>Image file depicts a female child under 6 years of age asleep in what appears to be a bed with a naked adult male putting his erect penis in the hand of the child.</i>
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In violation of 18 U.S.C. § 2251(a) and (e).

**INTRODUCTION**

1. I further state that I am a Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI) and that this complaint is based on the following facts through an investigation I have conducted, my training and experience, and information provided to

me by other law enforcement officers.

2. I have been commissioned as a Texas Peace Officer with the Fort Worth Police Department since September of 2015. During my time as peace officer, I have investigated cases involving computer-related criminal activity and violent crimes against children. I am currently assigned to the FBI's Crimes Against Children Human Trafficking Task Force as a TFO since July of 2024, in the Dallas-Fort Worth Division. As an FBI TFO, I am authorized to investigate violations of United States laws, including violations relating to child exploitation and child pornography, including the production, transportation, receipt, distribution, and possession of child pornography, in violation of 18 U.S.C. §§ 2251, 2252, and 2252A. I have gained experience in conducting these investigations through training and through everyday work, including executing search warrants and interviewing individuals who sexually exploit and abuse minors and who possess and trade child pornography. I have also received training relating to the Innocent Images National Initiative, which includes training in the investigation and enforcement of federal child pornography laws in which computers and other digital media are used as a means for receiving, transmitting, and storing child pornography.

3. I make this affidavit in support of criminal complaint charging **Jamie Hackney**, while in the Fort Worth Division of the Northern District of Texas, with a violation of 18 U.S.C. § 2251(a) and (e), that is, production of child pornography. The statements contained in this affidavit are based on information provided by FBI Special Agents and other members of law enforcement; information gathered from the service of

legal process; the results of physical and electronic surveillance conducted by law enforcement agents; and my experience, training, and background as a TFO with the FBI. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish probable cause to believe that **Jamie Hackney** did knowingly commit the offense described herein.

### **CRIMINAL COMPLAINT**

4. On Tuesday, October 15, 2024, the Dallas Police Department (DPD) sent a notification to the Fort Worth Police Department of an escalated Cybertip involving a suspect believed to be creating Child Sexual Abuse Material (CSAM) at a residence in Fort Worth, Texas. The Cybertip was provided by Google, LLC and indicated that a user named "Jamie H" with phone number (XXX) XXX-9441, a birthdate of XX/XX/1988 and an email address jamiehxxxx1988@gmail.com had uploaded three images of CSAM to his Google Drive. Additionally, DPD reported that this was the second Cybertip they had received from Google connected to this suspect.

5. I reviewed the images and all three images appeared to be the same photo. The file uploaded to Google is described as follows:

Filename:	File Description:
IMG_6513.JPG	<i>Image file depicts a female child under 6 years of age asleep in what appears to be a bed with a naked adult male putting his erect penis in the hand of the child.</i>

This media file appears to depict a real child who is engaged in sexually explicit conduct, and based on my training and experience, I believe this photo meets the definition of child pornography as defined in 18 U.S.C. § 2256.

6. The Cybertip provided the EXIF Metadata attached to the photo. Based on my training and experience, I am familiar with the EXIF or metadata on a digital image and how that information is recorded or logged in the computer or device that captured the image. When a digital image is captured on a cellular device, the EXIF Metadata for that image can provide a snapshot of information including: the location the image was captured, the device that captured the image, and the time and date the image was created. The EXIF metadata of the image provided by Google on the Cybertip indicated the image was captured on an Apple iPhone XR on May 27, 2024, and provided an exact location of the image capture as XXXX NW 20<sup>th</sup> St, Fort Worth, Texas.<sup>1</sup>

7. Through a law enforcement research database, I searched the phone number provided by Google, (XXX) XXX-9441, which returned to **Jamie Hackney** and matched

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<sup>1</sup> The EXIF Metadata provided it in Latitude and Longitude coordinates.



the same date of birth listed on his Google account. The database provided his residence as XXXX NW 20th St, Fort Worth, Texas, the same location reported by Google in the Cybertip.

8. The Cybertip also provided a possible Facebook account associated with the Google subscriber. The account username provided was “jamie.xxx1988”. A brief review of the account showed a profile picture and other photos depicting a prepubescent child that appeared similar to the one depicted in the Cybertip.

9. I reviewed the previous Cybertip received by DPD which was also reported by Google and contained the same username and subscriber info linked to **Hackney**. In the previous Cybertip, Google reported an upload of 36 files of CSAM to the user’s Google Drive. One of the images depicted a prepubescent female, lying naked on her back in a lewd and lascivious exhibition of her genitals.


10. On October 16, 2024, I obtained a state search warrant in the Northern District of Texas to search **Hackney’s** residence, and to seize electronic devices and evidence related to the previously described child pornography investigation. During the execution of the warrant, I conducted a voluntary interview with **Hackney**, and confirmed his date of birth as XX/XX/1988. During the interview, **Hackney** admitted to viewing child pornography using his Samsung cellphone. He also claimed ownership of the email address, jamiexxx1988@gmail.com, and telephone number (XXX) XXX–9441; both of which are referenced in the Google account and the CyberTipline Report(s).

11. **Hackney** was presented with the image described in paragraph 5 and identified the child as Minor Victim One, and himself as the adult male. He further described placing Minor Victim One's hand on his erect penis while the child was asleep.

12. I am aware that **Hackney** had to connect a device to the Internet to transport or transmit the image file described in paragraph 5 of this affidavit to his Google Drive account. Further, the Internet is a means and facility of interstate and foreign commerce, and the image was transported across state lines when the video was uploaded to his Google Drive.

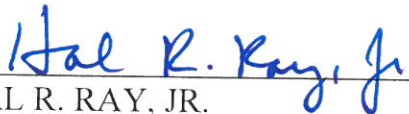
**CONCLUSION**

13. Therefore, based on the facts set forth above, I respectfully submit there is probable cause to believe that on or about May 27, 2024, **Jamie Hackney** did use, and attempt to use a minor to engage in sexually explicit conduct, for the purpose of producing a visual depiction of such conduct, and such visual depiction was actually transported using any means and facility of interstate and foreign commerce. Specifically, **Jamie Hackney** used Minor Victim One to create a visual depiction of a minor engaged in sexually explicit conduct and transported the image via the Internet, in violation of 18 U.S.C. 2251(a) and (e).



Christoffer Beckrich  
Task Force Officer  
Federal Bureau of Investigation

SWORN AND SUBSCRIBED to before me on this 17<sup>th</sup> day of October 2024, at 10:3  
am pm, in Fort Worth, Texas.



HAL R. RAY, JR.  
UNITED STATES MAGISTRATE JUDGE